

Michael W. Sobol (State Bar No. 194857)
 Roger N. Heller (State Bar No. 215348)
 LIEFF CABRASER HEIMANN &
 BERNSTEIN LLP
 275 Battery Street, 29th Floor
 San Francisco, CA 94111
 Telephone: (415) 956-1000
 Facsimile: (415) 956-1008
 msobol@lchb.com

Daniel M. Hattis (State Bar No. 232141)
 HATTIS LAW
 9221 NE 25th Street
 Clyde Hill, WA 98004
 Telephone: (650) 980-1990
 dan@hattislaw.com

Attorneys for Plaintiff Sam Williamson

Tina Wolfson (State Bar No. 174806)
 Robert Ahdoot (State Bar No. 172098)
 Theodore W. Maya (State Bar No. 223242)
 AHDOOT & WOLFSON, P.C.
 10850 Wilshire Boulevard, Suite 370
 Los Angeles, California 90024
 Telephone: (310) 474-9111
 Facsimile: (310) 474-8585
 twolfson@ahdootwolfson.com

Attorneys for Plaintiff Samantha Kirby

Daniel F. Katz (*pro hac vice*)
 David S. Kurtzer-Ellenbogen (*pro hac vice*)
 WILLIAMS & CONNOLLY LLP
 725 Twelfth Street, N.W.
 Washington, DC 20005
 Telephone: (202) 434-5000
 Facsimile: (202) 434-5029
 dkatz@wc.com

Ellen A. Cirangle (SBN 164188)
 LUBIN OLSON & NIEWIADOMSKI LLP
 Transamerica Pyramid
 600 Montgomery Street, 14th Floor
 San Francisco, CA 94111
 Telephone: (415) 981-0550
 Facsimile: (415) 981-4343
 mdonner@lubinolson.com

Attorneys for Defendant McAfee, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SAM WILLIAMSON, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

McAfee, Inc.,

Defendant.

Case No. 5:14-cv-00158-EJD

**STIPULATION AND ~~PROPOSED~~
 SCHEDULING ORDER**
 (AS MODIFIED)

Date:
 Time:
 Honorable Edward J. Davila

1 SAMANTHA KIRBY, individually and on
2 behalf of all others similarly situated,

3 Plaintiff,

4 v.

5 MCAFEE, INC.,

6 Defendant.
7

Case No. 5:14-cv-02475-EJD

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WHEREAS, on April 8, 2016, the parties in the above-captioned *Williamson* and *Kirby* actions informed the Court that they had reached an agreement in principle, had executed a term sheet subject to full documentation, and had begun the process of preparing the final settlement agreement and related documentation;

WHEREAS, on May 26, 2016, the Court held a Status Conference in the *Williamson* and *Kirby* actions, during which counsel for the parties updated the Court that they had made significant progress towards finalizing the settlement papers, were continuing to work diligently on same, and anticipated finalizing the settlement papers and filing a motion for preliminary settlement approval within approximately one month;

WHEREAS, at the May 26, 2016 Status Conference, at the parties' suggestion, the Court directed the parties to confer regarding their availability and to submit by June 3, 2016 a proposed schedule regarding the anticipated motion for preliminary settlement approval. (*Williamson* Dkt. No. 88; *Kirby* Dkt. No. 59); and

WHEREAS, the parties have conferred and, based on the current status of the settlement papers and the availability of counsel and the Court, respectfully propose to the Court the following schedule:

July 14, 2016	Motion for preliminary settlement approval to be filed
August 18, 2016, 9:00 a.m.	Hearing on motion for preliminary settlement approval.

NOW THEREFORE, ALL PARTIES, BY AND THROUGH THEIR UNDERSIGNED COUNSEL hereby stipulate and respectfully request that the Court set the following schedule regarding the anticipated motion for preliminary settlement approval:

July 14, 2016	Motion for preliminary settlement approval to be filed
August 18, 2016, 10:00 a.m. (Special Set)	Hearing on motion for preliminary settlement approval.

IT IS SO STIPULATED.

Dated: June 2, 2016

WILLIAMS & CONNOLLY LLP

By: /s/ Daniel F. Katz

Daniel F. Katz
Attorneys for Defendant
McAFEE, INC.

Dated: June 2, 2016

LUBIN OLSON & NIEWIADOMSKI LLP

By: /s/ Ellen A. Cirangle

Ellen A. Cirangle
Attorneys for Defendant
McAFEE, INC.

Dated: June 2, 2016

LIEFF CABRASER HEIMANN & BERNSTEIN
LLP

By: /s/ Roger N. Heller

Roger N. Heller
Attorneys for Plaintiff
SAM WILLIAMSON

Dated: June 2, 2016

HATTIS LAW

By: /s/ Daniel M. Hattis

Daniel M. Hattis
Attorneys for Plaintiff
SAM WILLIAMSON

1
2 Dated: June 2, 2016

AHDOOT & WOLFSON, P.C.

3 By: /s/ Tina Wolfson

4 Tina Wolfson

Attorneys for Plaintiff

5 SAMANTHA KIRBY

6
7
8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

9
10 Date: June 6, 2016



11 EDWARD J. DAVILA

12 United States District Judge

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing document. In compliance with General Order 45, I hereby attest that the signatories indicated above via a conformed signature have concurred in this filing.

By: /s/ Roger N. Heller

1306465.3